

EXHIBIT C

From: Cross, David D.
Sent: Saturday, May 9, 2020 5:54 PM
To: Bryan Tyson; Kaiser, Mary; Bruce Brown
Cc: Robert McGuire; Cary Ichter; Carlin, John P.; Alexander Denton; Bryan Jacoutot; Brian Lake; cheryl.ringer@fultoncountyga.gov; Carey Miller; david.lowman@fultoncountyga.gov; dbrody@lawyerscommittee.org; erosenberg@lawyerscommittee.org; hknapp@khlawfirm.com; Josh Belinfante; jpowers@lawyerscommittee.org; kaye.burwell@fultoncountyga.gov; sparks@khlawfirm.com; vrusso@robbinsfirm.com; Cate Berenato; Loree Anne Paradise; Melanie Johnson; Bryan Tyson
Subject: RE: Curling v. Raffensperger - correspondence regarding preservation of DREs

Bryan -

There's much in this lengthy letter we'll need to carefully review and address, but some clarity regarding your position is necessary to do that.

If we were to assume the cost of preserving DREs for the litigation, I assume we could take possession of some or all of them and would be free to do with them as we choose. Is that correct?

If we're to consider assuming any costs, we need a specific breakdown of those costs. Can you please provide them?

Why are the samples that plaintiffs identified a while ago unacceptable? You complain about cost but acknowledge that we offered to release at least two thirds or so of the DREs a while ago. I don't recall any response to plaintiffs' proposals (if I'm forgetting a response, please resend). So to say that we're requiring preservation of all DREs at a cost of about \$500,000 per year looks to me to be inaccurate. Can you please explain?

Thanks.
DC

From: Bryan Tyson <btyson@taylorenglish.com>
Date: Saturday, May 09, 2020, 5:17 PM
To: Kaiser, Mary <MKaiser@mofo.com>, Bruce Brown <bbrown@brucebrownlaw.com>
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Subject: Curling v. Raffensperger - correspondence regarding preservation of DREs

- External Email -

All:

Please see the attached letter regarding continued preservation of the DREs.

Thanks,

Bryan



Bryan P. Tyson

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